

EXHIBIT 53

Human Trafficking

What is Human Trafficking?

Human trafficking is the recruitment, transportation, provision, or obtaining of a person for labor or services, through the use of force of coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery. Human trafficking has become the second largest criminal enterprise and is currently the **fastest growing** criminal industry in the world.



The Victims

Human trafficking does not discriminate. Per the Global Slavery Index Report, it is estimated that 45.6 million people are currently enslaved worldwide. Victims include men, women, boys, girls, and transgender individuals lured by false promises of love or opportunity. Statistics from the National Center for Missing and Exploited Children estimate about 100,000 children per year, are caught up in the web of child prostitution.

Key indicators/Red flags of potential Human Trafficking activity:

Customer Behavior

- Excessive number of individual accounts
- No deposits from an employer
- Reports of identity theft
- Hiring of immigration attorneys or ties to other labor intermediaries to handle visa paperwork
- Business industries with links to human trafficking (e.g. modeling, travel & transportation)



Human Trafficking

Key indicators/Red flags of potential Human Trafficking activity (cont'd):

Source of Funds

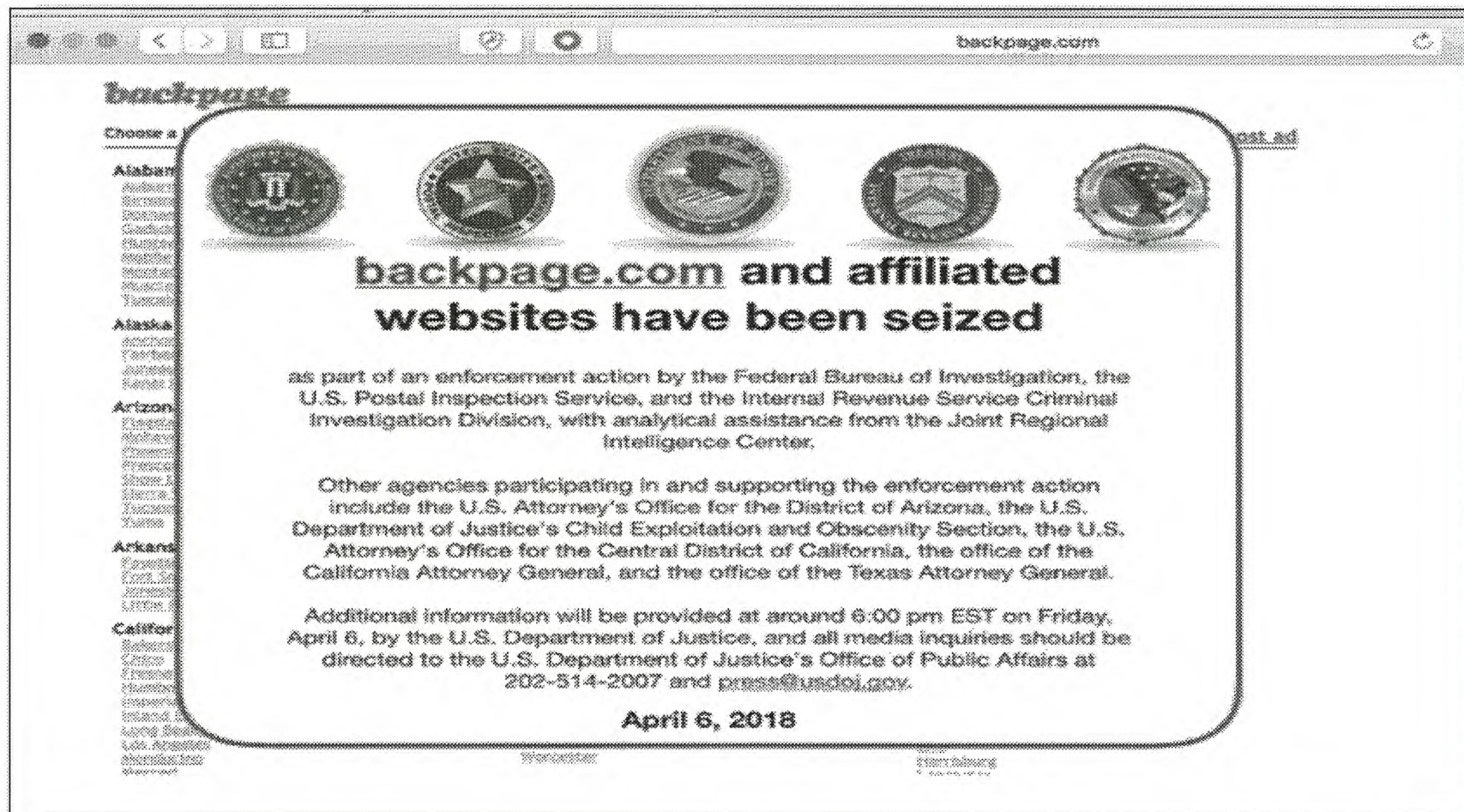
- Round- dollar deposits via wires, ACH or cash
- Excessive interstate or intrastate cash deposits less than \$1,000 (round dollar), using multiple branches
- Cash deposits below the CTR threshold deposited at several branches & ATMs
- Structured transactions, particularly those conducted via MSBs
- Incoming wires or personal checks deposited into business accounts with no clear purpose

Use of Funds

- High volume of debit card/ credit card transactions with the following types of merchants:
 - Airline and/or rental car companies in multiple cities or states
 - Hotel or casino charges and purchases made at high end merchants (jewelry, accessories, apparel)
 - Online advertisement providers (see list of known sites)
- Excessive payments to property management companies, utility companies, and cell phone companies
- Purchase of money orders to pay bills instead of using personal checks
- Wire transfers to countries with high migrant populations, following unusual cash deposits
- Wire activity inconsistent with business, particularly international or round dollar wires (e.g. nail salon operating in Queens, NY receives large value wire transfers from South America or Southeast Asia, or wires in even thousand-dollar increments.)

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NOTE: As of April 6, 2018, backpage.com and affiliated websites have been seized by U.S. enforcement agencies...



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...law enforcement has identified **at least 30 sites** that have taken its place, including:

- www.bedpage.com
- www.thebqe.com
- www.onebackpage.com
- www.theeroticreview.com – must turn on VPN and “locate” to another country
- switter.at and listing.switter.at
- SafeOffice (sex workers only): <https://www.safeoffice.com/>
- Discord (sex workers only): <https://discord.gg/UJK2TKH/> [Requires additional confirmation that you're a sex worker.]
- Telegram: <https://t.me/joinchat/FMw3QxB-bdEM4gi6fw3A6w>
- TER boards: <https://www.theeroticreview.com/> [Forums up, not accepting ads.]
- Stripperweb: <https://www.stripperweb.com>
- Eroticmonkey: <https://www.eroticmonkey.com/> [Down as of 2018-04-06]
- Eros.com: <https://www.eros.com/>
- P411: <https://preferred411.com/>
- Eccie: <https://eccie.net/> (Down as of 2018-04-07)
- Slixa: <https://www.slixa.com/>
- TNA: <https://www.tnaboard.com/>
- SA Sex Guide: <http://www.usasexguide.info>
- Plenty of Fish: <https://www.pof.com/> (Not SW-friendly, but SWers have used it)
- Skipthegames: <https://skipthegames.com>
- City of Love: <http://www.cityoflove.com/>
- Open Adult Directory: <https://openadultdirectory.com/escorts/>
- Mature Sensual: <https://maturesensual.com/>
- Escort Ads: <https://www.escort-ads.com/>
- Humaniplex: <http://www.humaniplex.com>
- Cityxguide: <https://www.cityxguide.com>
- The Other Board: <https://www.theotherboard.com>
- RentMen: <https://rent.men/>
- Onebackpage: <https://onebackpage.com>
- Rent.love: <https://www.rent.love>
- Doublelist.com: <https://www.doublelist.com>
- Hubzilla: <https://gerzilla.de/channel/sexworkers>
- Dread (Tor-only): <http://dreadecomdopooda.onion/d/sexworkers>
- Minds.com Sex Workers Forum - <https://www.minds.com/groups/profile/825386597235675136>
- Riot.im: <https://riot.im/app/#/room/#sw:matrix.org>

Be on the lookout for any of the above websites during your investigation! It may indicate potential human trafficking activity is occurring.

Human Trafficking

AML Investigations promotes cases involving possible Human Trafficking. But first, your investigation must **support** why you believe the activity is related to HT. Below are additional tips to assist you in determining whether HT may be present in your investigation.

Negative Media

Search an entity or customer name via open source or strategic corporate tools. Searches may yield negative news, arrests for prostitution/ human trafficking or other crimes which raise risk profile of an alert/ customer.

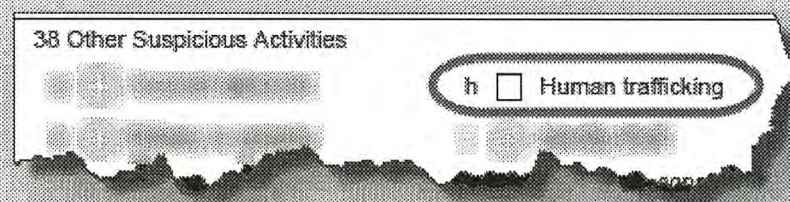
Demographic Links to Online Adult Advertising and Services

Searches of phone numbers, addresses, and email addresses may yield nexus to online advertising.

Previous AML History

Previous AML History, while not necessarily HT related, may be associated with an investigation related to suspicious activity such as interstate, excessive or structured cash activity.

Additionally, if a SAR is being filed on activity relating to potential human trafficking, don't forget to select "**Box 38h – Human trafficking**" in the Suspicious Activity Info section of the SAR form.



38 Other Suspicious Activities

☐ Human trafficking

What are potential quality concerns related to Human Trafficking?

- Are the reasons you suspect the activity is related to human trafficking adequately **explained in the SAR narrative**?
- Is **Box 38h** appropriately selected?
- Has the SAR been flagged as **Significant**, with the Significant SAR procedures **appropriately followed**?

